

**FILED**  
**CHARLOTTE, NC**

**JUL 13 2018**

**U.S. DISTRICT COURT**  
**WESTERN DISTRICT OF NC**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

UNITED STATES OF AMERICA )

v. )

TONYA LASHUN HALL )  
\_\_\_\_\_ )

DOCKET NO. 3:17-mc-47-FDW

**MOTION TO EXTEND REPORT DATE**

NOW COMES Defendant Tonya Lashun Hall, Pro Se, and hereby moves this Court to grant an extension of time to report to the Bureau of Prisons ('BOP').

In support, I show the following:

1. Upon information and belief, my attorney is presently out of the country (in Europe) and neither he nor his Office is in a position to submit this Motion to Extend my Report Date within a reasonable time. Accordingly, I am submitting this Motion Pro Se.

2. Upon information and belief, on December 12, 2017, I entered a guilty plea, before Your Honor, to a federal crime involving Criminal Contempt under Title 18 U.S.C. Section 410.

3. On that same date, December 12, 2017, the Court sentenced me to 6 months of incarceration, to be served at a federal correctional facility selected by the BOP.

4. By letter dated June 21, 2018, the BOP notified me that I am to report to FCI Aliceville in Aliceville, Alabama on July 17, 2018 by 12:00 noon. My BOP Register Number is: 33960-058.



5. I am requesting a 90-day extension of my report date or any alternative report date that this Honorable Court deems fair and just.

6. In support of this motion and request I further show:

a. I reside at 339 Morgan Place, SE Atlanta, GA 30317 with my two (2) daughters: Alexis Hall, aged 24 and Adejah Parrish, aged 19. They are both full time students. Alexis attends Kennesaw State University and is studying Public Relations and Social Media. Adejah attends West Georgia University and is studying Early Childhood Education. There are no other residents in our household and I support them financially. I have a third daughter, Arial Irons, aged 9. She is currently residing with her father.

b. On February 10, 2018, my daughter Adejah was a witness to a brutal and vicious murder that occurred at a clothing store called 'House of Fresh', located in Atlanta Georgia. She was working there at the time, on a part time basis. The Manager and 2 customers were also witnesses. Upon information and belief, there was a confrontation between the storeowner's brother (the deceased) and the killer. The killer saw my daughters' face and is still at large. My daughter has spoken extensively with Law Enforcement. She is deathly afraid and has quit her job there but the witnessing of this killing has profoundly and adversely affected her mentally and emotionally. As a mother, I am afraid for her and very concerned about her mental and emotional state. I feel that this incident, because of its recent nature, has greatly affected her sense of safety and security. As such, I am requesting additional time to be with her to help her through this period of intense fear.

c. My daughter Alexis is scheduled for 'gastric bypass' surgery in August 2018, She is suffering from Morbid Obesity. I am asking for additional time to be



with her through the operation and for a period of her recovery. She will need my attention, physical assistance and emotional support.

d. In addition to the items mentioned above, both my daughters will be alone while I am serving my jail sentence. As their primary parent, I would like (and feel that it is necessary to request) additional time to make arrangements for them to be alone and cared for and financially secure while I am serving my jail sentence.

e. I am gainfully employed full time and have been having difficulty making arrangements for my upcoming absence from work. I am compelled to ask for additional time to organize my work, notify clients and prepare others to 'cover' work responsibilities for me. I do not want to jeopardize my return to work once I am released. I am presently employed by Rusenko CPA, P.C. The office is located at 6065 Roswell Road, Suite 400, Sandy Springs, GA 30328, (404) 917-2700.

7. I submit that an extension of time to report would not inconvenience the Court or the Government. It would not cause the incursion of any additional cost to the Court or to the Government. Similarly, I submit that it would not subvert Justice.

8. I am respectfully asking this Honorable Court to grant my Motion to Extend my Report Date for the reasons set forth above and in the Interests of Justice.

Respectfully submitted, this 12<sup>th</sup> day of July, 2018.

/s/ Tonya Lashun Hall  
TONYA LASHUN HALL  
DEFENDANT, PRO SE

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SE Atlanta, GA 30317  
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**CERTIFICATE OF SERVICE**

A copy of the forgoing Motion is being served on the United States of America,  
R. Andrew Murray, United States Attorney, by Federal Express Mail Service.

This 12<sup>th</sup> day of July, 2018

/s/ Tonya Lashun Hall  
TONYA LASHUN HALL  
DEFENDANT, PRO SE

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